

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	310732
<015>	Study Area Name	UPPER PENINSULA TEL
<020>	Program Year	2018
<030>	Contact Name: Person USAC should contact with questions about this data	Vicki Kakuk
<035>	Contact Telephone Number: Number of the person identified in data line <030>	9066395000 ext.1003
<039>	Contact Email Address: Email of the person identified in data line <030>	vicki.kakuk@michbbs.com
Form Type		54.313 and 54.422

**(200) Service Outage Reporting (Voice)
Data Collection Form**

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<039>	Contact Email Address - Email Address of person identified in data line <030>	vicki.kakuk@michbbs.com

<210> For the prior calendar year, were there any reportable voice service outages?

[illegible]

(300) Unfulfilled Service Request
Data Collection Form

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OMB Control No. 3060-0986/OMB Control No. 3060-0819
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<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Vicki Kakuk
<035> Contact Telephone Number - Number of person identified in data line <030>	9066395000 ext.1003
<039> Contact Email Address - Email Address of person identified in data line <030>	vicki_kakuk@michbbs.com
<300> Unfulfilled service request (voice)	<div>1</div> 310732mi310.pdf
<310> Detail on attempts (voice)	Name of Attached Document
<320> Unfulfilled service request (broadband)	<div>1</div> 310732mi330.pdf
<330> Detail on attempts (broadband)	Name of Attached Document

(400) Number of Complaints, per 1,000 customers
Data Collection Form

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OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	330732
<015>	Study Area Name	UPPER PENINSULA TEL
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Vicki Kakuk
<035>	Contact Telephone Number - Number of person identified in data line <030>	9266195000 ext. 1001
<039>	Contact Email Address - Email Address of person identified in data line <030>	vicki.kakuk@michbbs.com
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. <div>Offered only fixed voice</div>	
<410>	Complaints per 1000 customers for fixed voice	0.0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. <div>Offered only fixed broadband</div>	
<440>	Complaints per 1000 customers for fixed broadband	0.0
<450>	Complaints per 1000 customers for mobile broadband	

(500) Compliance With Service Quality Standards and Consumer Protection Rules		FCC Form 481
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013
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<039>	Contact Email Address - Email Address of person identified in data line <030>	vicki.kakuk@michbbs.com
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	310732mi510.pdf
<515>	Certify compliance with applicable minimum service standards	

**(600) Functionality in Emergency Situations
Data Collection Form**FCC Form 481
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<039>	Contact Email Address - Email Address of person identified in data line <030>	vicki.kakuk@michbbs.com
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	310732mi610.pdf

**(700) Price Offerings including Voice Rate Data
Data Collection Form**

FCC Form 481

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<039>	Contact Email Address - Email Address of person identified in data line <030>	vicki.kakuk@michbbs.com
<701>	Residential Local Service Charge Effective Date	1/1/2017
<702>	Single State-wide Residential Local Service Charge	25.5

[illegible]

(710) Broadband Price Offerings
Data Collection Form

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[illegible]

**(800) Operating Companies
Data Collection Form**

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<039>	Contact Email Address - Email Address of person identified in data line <030>	vicki.kakuk@michbbs.com
<810>	Reporting Carrier	Upper Peninsula Telephone Company
<811>	Holding Company	LICT Corporation
<812>	Operating Company	Upper Peninsula Telephone Company

[illegible]

(900) Tribal Lands Reporting
Data Collection Form

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<039>	Contact Email Address - Email Address of person identified in data line <030>	vicki.kakuk@michbbs.com

<900> Does the filing entity offer tribal land services? (Y/N)

No

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

Select Yes or No or Not Applicable

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

**(1000) Voice and Broadband Service Rate Comparability
Data Collection Form**

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<039>	Contact Email Address - Email Address of person identified in data line <030>	vicki.kakuk@michbbs.com

<1000> Voice services rate comparability certification Yes

310732mi1010.pdf

<1010> Attach detailed description for voice services rate comparability compliance

Name of Attached Document

Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1020> Broadband comparability certification

310732mi1030.pdf

<1030> Attach detailed description for broadband comparability compliance

Name of Attached Document

(1100) No Terrestrial Backhaul Reporting
Data Collection Form

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<039>	Contact Email Address - Email Address of person identified in data line <030>	vicki.kakuk@michbbs.com

<1100>

Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130>

Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers		FCC Form 481	
Lifeline		OMB Control No. 3060-0986/OMB Control No. 3060-0819	
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<039>	Contact Email Address - Email Address of person identified in data line <030>	vicki.kakuk@michbbs.com

310732mi1210.pdf

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP www.michbbs.com

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support; carriers must annually report:

☒

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,

☒

<1222> Details on the number of minutes provided as part of the plan,

☒

<1223> Additional charges for toll calls, and rates for each such plan.

(2005) Price Cap Carrier Additional Documentation		FCC Form 481	
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819	
<i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>		July 2013	
<010>	Study Area Code	310732	
<015>	Study Area Name	UPPER PENINSULA TEL	
<020>	Program Year	2018	
<030>	Contact Name - Person USAC should contact regarding this data	Vicki Kakuk	
<035>	Contact Telephone Number - Number of person identified in data line <030>	9066395000 ext. 1003	
<039>	Contact Email Address - Email Address of person identified in data line <030>	vicki.kakuk@chbbs.com	

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

<2011>	3rd Year Certification 47 CFR §54.313(b)(1)(iii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.	
<2022>	Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.	
<2023>	The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year three - 54.313(b)(2)(ii). Round 2 recipients only.	
<2024A>	Round 2 Recipient of Incremental Support?	
<2024B>	Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(iii). Round 2 recipients only.	
<2025A>	Round 2 Recipient of Incremental Support?	
<2025B>	Attach geocoded information for Phase I milestone reports (Round 2 for year three) - Connect America Fund, WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).	
<2015>	2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)	

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

Name of Attached Document Listing
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)

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Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)	Yes - Attach Certification	
(3010A)	Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}	310732mi3010.pdf	
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	<input type="radio"/> (Yes) <input checked="" type="radio"/> (No)	
(3014)	If yes, does your company file the RUS annual report	(Yes/No) <input type="radio"/> (Yes) <input type="radio"/> (No)	
Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:			
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	<input type="checkbox"/>	
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>	
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No) <input type="radio"/> (Yes) <input type="radio"/> (No)	
If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers	<input type="checkbox"/>	
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>	
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.	<input type="checkbox"/>	
If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers	<input type="checkbox"/>	
(3023)	Underlying information subjected to a review by an independent certified public accountant	<input type="checkbox"/>	
(3024)	Underlying information subjected to an officer certification.	<input type="checkbox"/>	
(3025)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>	
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	

(3005) Rate Of Return Carrier Additional Documentation (Continued)

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<039>	Contact Email Address - Email Address of person identified in data line <030>	vicki.kakuk@mi.chbbbs.com

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends

**(4005) Rural Broadband Experiment Additional Documentation
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	31.0732
<015>	Study Area Name	UPPER PENINSULA TEL
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<030>	Contact Name - Person USAC should contact regarding this data	Vicki Kakuk
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<039>	Contact Email Address - Email Address of person identified in data line <030>	vicki.kakuk@nichbbs.com

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission's public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.

4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.

**Certification - Reporting Carrier
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TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: UPPER PENINSULA TEL	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/28/2017
Printed name of Authorized Officer: Bruce Moore	
Title or position of Authorized Officer: President and General Manager	
Telephone number of Authorized Officer: 9066395000 ext.105	
Study Area Code of Reporting Carrier: 310732	Filing Due Date for this form: 07/03/2017
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**Certification - Agent / Carrier
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TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	
Name of Authorized Agent Firm:	
Signature of Authorized Agent or Employee of Agent:	Date:
Name of Authorized Agent Employee:	
Title or position of Authorized Agent or Employee of Agent:	
Telephone number of Authorized Agent or Employee of Agent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

File name: 310732mi310

**Upper Peninsula Telephone Company
Line 310 – Unfulfilled Voice Telephony Service Requests Resolution**

As required in 47 C.F.R. § 54.313(a)(3), the following provides the detailed description of how the Company attempted to provide service to potential customers whose initial requests for service were unfulfilled in 2016 in the service area in which the Company is designated as an ETC for facilities that the Company owns, operates, leases, or otherwise utilizes.

UNFILLED SERVICE REQUESTS – The Company had one unfilled voice service request as of December 31, 2016. The customer requested service which required Aid to Construction fees to be paid based on the Company's tariff. The customer was not willing to pay the Aid to Construction; therefore, the service was not provided. The Company is working with the customer and due to the ACAM reasonable request process, the customer will receive broadband, and therefore, voice will also be provided, due to our reasonable request policy and analysis and this unfilled service request will be provisioned.

GENERAL PROCESS: The first step in the process of providing service was to have the Company's technical staff determine if current facilities exist to the customer location. Based on the analysis, once it was determined that facilities do not currently exist, a route feasibility analysis is prepared including an estimate of what facilities would be needed and the cost to build to the customer. If the cost to build to that customer exceeds the amount for which Aid to Construction is to be paid by the customer as determined in the Company's tariff, an Aid to Construction proposal document was prepared and submitted to the customer to determine if the Customer was willing to pay a portion of the costs, as defined by the tariff. If the customer was willing to pay the Aid to Construction, as required by the tariff, the company proceeded applying for the appropriate permit(s) after checking easements, rights-of-way, etc. If the customer was not willing to pay the Aid to Construction, the customer was informed that the service cannot be installed at this time. The customer was encouraged to check with neighbors to see if others in their area would like service since multiple customer requests would reduce the cost to serve the customer.

Please note that since the Company's territory is extremely rural, in areas where the Company does not own facilities, it is not possible to lease facilities from other companies since there are no other service providers in those extremely remote areas.

**Upper Peninsula Telephone Company
Line 330 – Unfulfilled Broadband Service Requests Resolution**

As required in 47 C.F.R. § 54.313(a)(3), the following provides the detailed description of how the Company attempted to provide service to potential customers whose initial requests for service were unfulfilled in 2016 in the service area in which the Company is designated as an ETC for facilities that the Company owns, operates, leases, or otherwise utilizes.

UNFILLED BROADBAND SERVICE REQUESTS – The Company had one (1) unfilled broadband service request as of December 31, 2016 where the customer requesting service was beyond the reach limitations associated with copper loops and ADSL technologies. The customer requested service but was unwilling to pay the required Aid to Construction, required in the Company's tariff. The Company is planning for facilities to be installed to the customer location in 2017, with no aid to construction requirement, due to this service request meeting the ACAM reasonable request analysis requirements.

GENERAL PROCESS: The first step in the process of providing service was to have the Company's technical staff determine if current facilities exist to the customer location that are capable of providing broadband service and what the maximum broadband speed that could be provided. The Company has extremely long loops in some of the most rural portions of our territory and broadband speed is extremely distance sensitive.

Based on the analysis, once it was determined that facilities do not currently exist or that the distance is too great to provide broadband, a route upgrade feasibility analysis is prepared including an estimate of what facilities would be needed and the cost to build to the customer.

In locations where 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas, cannot be provided currently, a reasonable request financial analysis is performed based on the requirements included in the FCC Orders related to reasonable requests including those shown on the following pages.

If the request meets the qualifications of the reasonable request analysis, broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas, is provided within a reasonable amount of time as required by 47 C.F.R. § 54.313(f)(1)(i).

If the request does not meet the qualifications of the reasonable request analysis, broadband service is analyzed at actual speeds of at least 4 Mbps downstream/1 Mbps upstream and if that

analysis meets the qualifications of the reasonable request analysis, broadband service is provided at actual speeds of at least 4 Mbps downstream/1 Mbps upstream as required by the FCC rules and regulations within a reasonable amount of time as required by 47 C.F.R. § 54.313(f)(1)(i).

If the reasonable request analysis does not meet the qualifications for either the 10 Mbps or the 4 Mbps reasonable request analysis, the customer is informed that broadband service cannot be provided at this time at either of those speed levels and provided information on what speed level would be available at their location. The reasonable request analysis is retained and recomputed if significant conditions change, as required by the FCC rules and regulations.

DELAYS DUE TO PERMITS: In some cases, service installations become delayed due to permit(s) that are required to install the new facilities. The Company works with a myriad of government agencies and cannot install new facilities absent the appropriate government permit(s). In those cases, the Company informs the customer that we are awaiting permit(s) and that the facilities will be installed once the appropriate permit(s) are obtained. In some cases, the governmental agency has taken multiple years to approve permit(s).

Please note that since the Company's territory is extremely rural, in areas where the Company does not own facilities, it is not possible to lease facilities from other companies since there are no other service providers in those extremely remote areas.

Upper Peninsula Telephone Company

Compliance with Service Quality Standards and Consumer Protection

As required in 47 C.F.R. § 54.313(a)(5) for High-cost Recipients, the following is a detailed description of how the Company complies with Service Quality Standards and Consumer Protection Rules.

SERVICE QUALITY STANDARDS: The Company abides by the general industry standards for service quality. The Company takes quality of service very seriously and is continually training the employees in order to make certain that the highest level of service is provided to the customers.

CONSUMER PROTECTION RULES:

The Company developed and implemented a Customer Proprietary Network Information ("CPNI") Compliance Manual and has appointed a CPNI Compliance Officer. Annually, the Company requires all employees to certify that they have reviewed and understand the CPNI Compliance Manual and that they understand that any violation of the Company's CPNI procedures may result in disciplinary action up to and including dismissal. The Company files an annual report with the Federal Communications Commission ("FCC") certifying compliance with the FCC's CPNI rules.

The Company also developed and implemented an Identity Theft Prevention Program Manual and has appointed a Red Flag Coordinator. Annually, the Company requires all employees certify that they have reviewed and understand the Identity Theft Prevention Program Manual. Further, employees must certify that they understand that any violation of the Company's identity theft prevention procedures may result in disciplinary action up to and including dismissal.

310732mi510

Upper Peninsula Telephone Company

Compliance with Service Quality Standards and Consumer Protection

The State of Michigan has no quality of service rules in place at this time.

**Upper Peninsula Telephone Company
Line 610 – Functionality in Emergency Situations**

As required in 47 C.F.R. § 54.313(a)(6) for all high cost recipients, which includes the Company, and as set forth in 47 C.F.R. § 54.202(a)(2), the following provides a detailed description demonstrating that the Company has the ability to remain functional in emergency situations, including a demonstration that 1) it has eight (8) hours of back-up power to ensure functionality without an external power source, 2) is able to reroute traffic around damaged facilities, and 3) is capable of managing traffic spikes resulting from emergency situations.

OVERALL RESPONSE TO EMERGENCY SITUATIONS: The Company has a comprehensive disaster recovery plan (also called a “continuity plan”) that was developed and implemented for the Company specifically to deal with emergencies. It has detailed, specific steps that are to be taken for each type of emergency.

POWER: In order to function in an emergency, the Company has a combination of batteries and emergency generators. Some locations have permanent emergency generators with fuel tanks; whereas, other locations require a portable generator to be brought to the location to recharge the on-site batteries. The company owns several portable generators that technicians can take out to recharge the batteries. For example, the company’s central offices have automatic stand-by generators to run the entire offices. The digital loop carrier (“DLC”) sites also have battery back-up.

REROUTING TRAFFIC AND REDUNDANCY: The Company has established 100% redundant E-911 trunks and SS-7 routes. In addition, the network was designed with redundancy, wherever possible, especially in the backbone network. Where it is not redundant, the Company has the ability to redirect most backbone traffic. In cases where there is no redundancy, it is due to the extreme cost of a 100% redundant network. For example, the loop to the customer location is typically not redundant, especially for residential customers. This is because it would not be cost effective to build totally separate facilities for the “last mile” to the customer.

MANAGING TRAFFIC SPIKES: The Company realizes that when a catastrophe happens, everyone immediately tries to contact friends and family to make certain they are all right. The Company has designed the network to have excess capacity on its backbone network. For example, on Mother’s Day, the company handles traffic without the customer receiving the “All Trunks Busy” message which demonstrates the Company’s ability to handle peak traffic spikes.

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July 2013

310732

UPPER PENINSULA TEL

2018

Vicki Kakuk

9066395000 ext.1003

vicki.kakuk@michbbs.com

1/1/2017

25.5

<703>

(800) Operating Companies**Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	310732
<015>	Study Area Name	UPPER PENINSULA TEL
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Vicki Kakuk
<035>	Contact Telephone Number - Number of person identified in data line <030>	9066395000 ext.1003
<039>	Contact Email Address - Email Address of person identified in data line <030>	vicki.kakuk@michbbs.com
<810>	Reporting Carrier	Upper Peninsula Telephone Company
<811>	Holding Company	LICT Corporation
<812>	Operating Company	Upper Peninsula Telephone Company

<a1>	<a2>	<a3>
Affiliates	SAC	Doing Business As Company or Brand Designation
Bretton Woods Telephone Company, Inc.	120038	Bretton Woods, World Surfer
Upper Peninsula Telephone Company	310732	Michigan Broadband Services, UPTC, MCBC, Alphacomm.net
Michigan Central Broadband Company	310785	Michigan Broadband Services, MCBC, Alphacomm.net
Belmont Telephone Company	330847	Belmont, LaGrant Connections, LLC
Cuba City Telephone Exchange Company	330872	Cuba City, LaGrant Connections, LLC
Central Scott Telephone Company	351125	Central Scott
CST Communications, Inc.	359032	CST Communications, iWireless
Dixon Acquisition LLC	351150	Central Scott, Dixon Telephone Company
Haviland Telephone Company, Inc.	411780	Haviland, Giant Communications, Inc.
J. B. N. Telephone Company, Inc.	411785	J.B.N., Giant Communications, Inc.
Western New Mexico Telephone Co., Inc.	492268	WNM Communications
Central Utah Tel Inc.	502277	CentraCom, CentraCom Interactive
Skyline Telecom	502283	CentraCom, CentraCom Interactive
Bear Lake Comm	503032	CentraCom, CentraCom Interactive
Cal-Ore Telephone Company	542311	Cal-Ore
Giant Communications, Inc.		Giant
Alpha Enterprises Limited, Inc.		Alphacomm.net
World Surfer, Inc.		World Surfer
INTERCOMMUNITY TELEPHONE COMPANY	381616	InterCommunity
Valley Communications, Inc.		Valley
Central Telcom Services, LLC		CentraCom, CentraCom Interactive
LaGrant Connections, LLC		LaGrant Connections, LLC
WNM Communications Corporation		WNM Communications

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July 2013

<010>	Study Area Code	310732
<015>	Study Area Name	UPPER PENINSULA TEL
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Vicki Kakuk
<035>	Contact Telephone Number - Number of person identified in data line <030>	9066395000 ext.1003
<039>	Contact Email Address - Email Address of person identified in data line <030>	vicki.kakuk@nichbbs.com
<810>	Reporting Carrier	Upper Peninsula Telephone Company
<811>	Holding Company	LICT Corporation
<812>	Operating Company	Upper Peninsula Telephone Company

[illegible]

File name: 310732mi1010.pdf

**Upper Peninsula Telephone Company
Line 1010 – Voice Services Rate Comparability**

As required in 47 C.F.R. § 54.313(a)(10), any recipient of high-cost support shall provide a letter certifying that the pricing of the company's voice services is no more than two standard deviations above the applicable national average urban rate for voice services, as specified in the most recent public notice issued by the Wireline Competition Bureau and Wireless Telecommunications Bureau.

The following provides the Company's support for Line 1010 -Description of Voice Service Rate Comparability.

As of January 1, 2017, the Company charges the following fixed voice prices:

Flat Rate Residential Service	\$25.50
State Residential Subscriber Line Charge	0.00
State Universal Service Charge Fee	0.00
Mandatory Extended Area Service	0.00
Residential Federal Subscriber Line Charge	<u>6.50</u>
Total Residential Fixed Voice Charges	<u>\$32.00</u>

Since the total for residential fixed voice that the Company charges, as shown above, is above the 2016 rate floor for voice services of \$22.49 and below the reasonable comparability benchmark for voice services of \$49.51, announced by the FCC Wireline Competition Bureau in the Public Notice released on February 14, 2017 (DA 17-167), the Company hereby certifies that it is in compliance with 47 C.F.R. § 54.313(a)(10).

File name: 310732mi1030.pdf

**Upper Peninsula Telephone Company
Line 1030 – Broadband Comparability**

In a December 2014 Order (FCC 14-90), paragraphs 119-123, the FCC created Section 54.313(a)(12) which requires recipients of High Cost Program and/or Connect America Fund support that are subject to broadband performance obligations to submit a broadband reasonable comparability rate certification.

The following provides the Company's support for Line 1020 - Description of Broadband Service Rate Comparability.

As of January 1, 2017, the Company charges the following residential broadband prices:

Download Speed	25Mbps	10Mbps	6Mbps	4Mbps
Upload Speed	3Mbps	1Mbps	1Mbps	1Mbps
Usage Allowance	Unlimited	Unlimited	Unlimited	Unlimited
TOTAL RESIDENTIAL	\$83.95	\$63.95	\$51.95	\$44.95

Since the total for residential broadband that the Company charges for 10 Mbps x 1 Mbps service, as shown above, is below the \$77.98 for 10 Mbps x 1 Mbps service with the unlimited usage allowance, which is the reasonable comparability benchmark for broadband service announced by the FCC Wireline Competition Bureau in the Public Notice released on February 14, 2017 (DA 17-167), the Company hereby certifies that it is in compliance with 47 C.F.R. § 54.313(a)(12).

LIFELINE SERVICE TERMS AND CONDITIONS

A. DESCRIPTION

1. Lifeline Service applies discounts to monthly recurring rates for qualifying residential customers. These discounts are applied to existing tariffed rates and charges for residential telephone service. The Company's voice Lifeline plan includes unlimited local minutes-of-use within the toll-free calling area. Residential customers are allowed 2,000 minutes of calling into their expanded local calling areas (adjacent exchanges) free of charge each month. Each minute after that is charged at \$0.05 per minute.
2. In order to be eligible for Lifeline Service a residential customer's household income must be at or below 150% of the poverty level as determined by the U.S. Department of Health and Human Services and as approved by the State Treasurer, or the customer must participate in one of the following federal assistance programs:
 - a. Medicaid
 - b. Supplemental Nutrition Assistance Program (SNAP) - Food stamps
 - c. Supplemental security income (SSI)
 - d. Federal public housing assistance/Section 8
 - e. Low-income home energy assistance program (LIHEAP)
 - f. National school lunch program's free lunch program
 - g. Temporary assistance for needy families (TANF) aka Family Independence Program
 - h. Veteran's Pension Program
 - i. Veteran's Survivor's Pension Program
3. Other services can be provided with the Lifeline Service at applicable rates and charges.
4. Proof of eligibility will be required for all initial applicants and all Lifeline recipients will be required to re-certify every year.

B. REGULATIONS

1. Regulations specified elsewhere in the Company's tariffs apply to Lifeline Service.
2. Lifeline Service is only available with residence services, excluding foreign exchange service. Lifeline Service is limited to one line per household at the customer's primary residence.
3. A miscellaneous service charge does not apply when Lifeline Service is added or discontinued to existing service when that is the only work being done.
4.
 - a. The discount on the monthly rate for qualified Lifeline customers shall be \$9.25. Credits are applied to the end user's basic local exchange service. At no time shall the total Lifeline credit exceed the sum of the end user common line charge and the basic local exchange rate. The discount on the monthly rate for qualified Lifeline customers 65 years of age or more shall be \$12.35. At no time shall the total Lifeline credit exceed the sum of the end user common line charge and the basic local exchange rate. Qualified participants on tribal lands will receive, in addition to the discounts listed above, an additional federal approved reduction of up to \$25.00 applied to the monthly local service rate.
 - b. The Company will provide, at the qualifying customer's option, toll blocking service at no charge. Toll blocking is defined as a central office service that restricts access to the network. Toll blocking is provided where facilities permit and will not allow 1+, 0+, 0-, 101XXXX, 900, or interzone calls to be completed. Toll blocking does not restrict local calls, calls to intraNPA directory assistance, telephone repair service, 911, or calls to 800 or 950 numbers.
 - c. The Company will not require a service deposit to initiate Lifeline Service if the qualifying customer voluntarily elects toll blocking service.

- d. The Company will provide, at the qualifying customer's option, long distance (toll) service at the rate of \$0.12 per minute. In addition to this basic long distance calling rate, the Company also offers the following long distance call plans: 200 minutes of long distance calling at the rate of \$19.00 per month, 400 minutes of long distance calling at the rate of \$34.00 per month, or 600 minutes of long distance calling at the rate of \$45.00 per month.
 - e. Participants in Lifeline shall not be disconnected from local service for non-payment of toll charges. In addition, the Company will not deny reestablishment of local service to customers who are eligible for Lifeline and have previously been disconnected for non-payment of toll charges.
- 5. The Lifeline plan will apply after receipt and processing of a completed company or community/government-provided application, including documentation indicating that the household income meets the eligibility standards established above.
 - 6. Customers of Lifeline Service must notify the Company of any changes which would affect qualification. Re-certification of eligibility will take place on an ongoing basis. When the customer is no longer eligible for Lifeline Service, the Lifeline discount would be discontinued and regular tariff rates and charges would apply.

C. TRIBAL LINK UP PROGRAM

- 1. A discount on the line connection charge specified elsewhere in this tariff is also available to qualifying customers for the installation or transfer of service from one residential premises to another.
 - a. A qualifying customer may receive a 100% reduction in the installation charges, or transfer of service charges for connection at the customer's principal place of residence.
 - b. A qualifying customer may then make payments for the connection charges on a deferred schedule in which the qualifying customer does not pay interest. The interest charges not charged to the qualifying customer shall be for connections charges of up to \$200.00 that are deferred for a period not to exceed one year. Charges assessed for installation or transfer of service include any charges that the Company customarily assesses to connect subscribers to the network. These charges do not include any permissible security deposit requirements.
 - c. A qualifying customer can receive the benefits of the Tribal Link Up Program for a second and subsequent time only for a principal place of residence with an address different from the residence address at which the Link Up assistance was provided previously.

D. ELIGIBLE RESIDENTS OF TRIBAL LANDS

Applicants residing on Tribal lands referenced in Title 25 Code of Federal Regulations, Section 20.1, paragraph (v) may qualify for Lifeline service in accordance with the qualification criteria contained on Sheet 25, or if they participate in one of the following federal programs:

- a. Bureau of Indian Affairs general assistance
- b. Tribally administered Temporary Assistance for Needy Families
- c. Head Start (must meet income qualifying standard of program)
- d. Food Distribution Program on Indian Reservations

An applicant residing on Tribal lands must certify under penalty of perjury that he/she resides on a reservation as defined in Title 25 Code of Federal Regulations, Section 20.1, paragraph (v) and meets at least one of the qualification criteria. The Tribal lands applicant also must agree to notify the Company if he or she ceases to qualify as an eligible resident of Tribal lands.

**Upper Peninsula Telephone Company
Line 3010 – Certification of Public Interest Obligations**

As required in 47 C.F.R. § 54.313(f)(1)(i), any rate-of-return ETC receiving support must certify it has taken reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas, and that requests for such service were met within a reasonable amount of time.

With this document, the Company hereby certifies that it has taken reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas, and that requests for such service were met within a reasonable amount of time as required by 47 C.F.R. § 54.313(f)(1)(i).

In locations where 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas, cannot be provided currently, a reasonable request financial analysis is performed based on the requirements included in the FCC Orders related to reasonable requests including those shown on the following pages.

If the request meets the qualifications of the reasonable request analysis, broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas, is provided within a reasonable amount of time as required by 47 C.F.R. § 54.313(f)(1)(i).

If the request does not meet the qualifications of the reasonable request analysis, broadband service is analyzed at actual speeds of at least 4 Mbps downstream/1 Mbps upstream and if that analysis meets the qualifications of the reasonable request analysis, broadband service is provided at actual speeds of at least 4 Mbps downstream/1 Mbps upstream as required by the FCC rules and regulations within a reasonable amount of time as required by 47 C.F.R. § 54.313(f)(1)(i).

If the reasonable request analysis does not meet the qualifications for either the 10 Mbps or the 4 Mbps reasonable request analysis, the customer is informed that broadband service cannot be provided at this time at either of those speed levels and provided information on what speed level would be available at their location. The reasonable request analysis is retained and recomputed if significant conditions change, as required by the FCC rules and regulations.

CERTIFICATION: The Company certifies that it is in compliance with the FCC Rules and Regulations and all appropriate documents are being filed as required by 47 C.F.R. § 54.313(f)(1)(i). The certification by an officer of the Company is included as part of the overall certification for the Form 481, which includes all attachments and is made by an officer of the Company whose responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients. The overall Form 481 certification is made that to the best of the officer's knowledge, the information reported on the Form 481, including attachments, is accurate.

Primary FCC Orders Relating to “Reasonable Requests” for Broadband Service

In its 2011 *USF/ICC Transformation Order*¹ the Commission required rate-of-return carriers receiving Universal Service Fund (USF) support to provide their customers with “at least the same initial minimum level of broadband service as those carriers who receive model-based support”² Recognizing RLECs’ generally small size, however, the Commission determined these carriers “should be provided greater flexibility in edging out their broadband-capable networks in response to consumer demand.” More specifically, the Commission stated that, “[u]pon receipt of a reasonable request for service, carriers must deploy broadband to the requesting customer within a reasonable amount of time.”³

In its 2012 *Third Order on Reconsideration*,⁴ the Commission clarified that its rules “provide sufficient flexibility to take into account any unique circumstances that may impact the ability of rate-of-return companies to extend broadband to their customers, including backhaul costs.”⁵

Later, in its 2014 *Seventh Order on Reconsideration*, the Commission acknowledged that there remained “some ambiguity” as to what would constitute an unreasonable request for service.⁶ It accordingly included a *Declaratory Ruling* to clarify matters.⁷

The *Declaratory Ruling* first suggests that rate-of-return carriers evaluating a request to extend broadband service should consider:

¹ See *Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing a Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*; WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd. 17663 (2011) (*USF/ICC Transformation Order*).

² *Id.* ¶ 206.

³ *Id.* ¶ 208.

⁴ See *Connect America Fund et al.*, WC Docket No. 10-90, *et. al.*, Third Order on Reconsideration, 27 FCC Rcd. 5622 (2012) (*Third Order on Reconsideration*).

⁵ *Id.* ¶ 46.

⁶ *Connect America Fund*, WC Docket No. 10-90, *Universal Service Reform – Mobility Fund*, WT Docket No. 10-208, *ETC Annual Reports and Certifications*, WC Docket No. 14-58, *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135, *Developing an Unified Intercarrier Compensation Regime*, CC Docket No. 01-92, Report and Order, Declaratory Ruling, Order, Memorandum Opinion and Order, Seventh Order on Reconsideration, and Further Notice of Proposed Rulemaking, FCC 29 FCC Rcd. 1175 (2014) ¶ 64 (*Seventh Order on Reconsideration*).

⁷ *Id.* ¶ 59.

whether it would be reasonable to make the necessary upgrades in light of anticipated end-user revenues from the retail provision of broadband service and other sources of revenues, including but not limited to federal or state universal service funding projected to be available under current rules. In considering end-user revenues, carriers should take into account the reasonable comparability benchmark for broadband services. If the incremental cost of undertaking the necessary upgrades to a particular location exceed the revenues that could be expected from that upgraded line, a request would not be reasonable.⁸

The Declaratory Ruling then specifically relates determination of unreasonable requests to the \$250/line cap on total high cost support imposed by the 2011 USF/ICC Transformation Order:

[A] request is not reasonable if it would require a carrier to undertake new network upgrades to install new backhaul facilities or to replace existing copper lines to the home with fiber merely for the purpose of newly providing broadband service in study areas where total support already is subject to the \$250 per line monthly cap. Moreover, we declare that a request is not reasonable if it would require a carrier to undertake new network upgrades to newly provide broadband service to requesting customers if that would cause total monthly support that presently is under the \$250 cap to exceed the cap⁹

The Commission also made clear a rate-of-return carrier has no obligation to extend broadband-capable infrastructure in any census block that is served by an unsubsidized competitor that meets the Commission's current performance standards.¹⁰

At the time the *Declaratory Ruling* was issued, the Commission was also considering whether to revise its broadband performance obligations to require higher speeds, such as 10Mbps downstream.¹¹ The Commission reiterated, however, that if minimum speed requirements were increased, a rate-of-return carrier would only be required to provide the higher speed service if the request was reasonable:

In determining whether a particular upgrade is cost effective, the carrier should consider not only its anticipated end-user revenues from the services to be offered over that network, both voice and retail broadband internet access, but also other sources of support, such as federal and, where available, state universal service funding. Under our proposal to increase the minimum downstream speed threshold, we thus would not expect a rate-of-return carrier immediately to upgrade its entire existing infrastructure

⁸ *Id.* ¶ 65.

⁹ *Id.* ¶ 67.

¹⁰ *Id.* ¶ 68.

¹¹ *Id.* ¶ 138.

to provide 10 Mbps downstream and 1 Mbps upstream (10 Mbps/1 Mbps) to all current customers. Rather, we propose that rate-of-return carriers would take into account any revised speed standards when considering whether and where to upgrade existing plant in the ordinary course of business and would report on progress toward this goal in preparing annual updates to their five-year service improvement plans.¹²

In a *Report and Order* released December 18, 2014 the Commission adopted several measures to address non-compliance with its CAF deployment obligations.¹³ Noting that rate-of-return carriers were required to build out their networks only on “reasonable request,” the Commission determined that non-compliance issues for RLECs should be dealt with on a case-by-case basis.¹⁴ (This differs significantly from the strict milestone-based measures applicable to other eligible telecommunications carriers (ETCs).)

The Commission further clarified that rate-of-return carriers “should report any requests that are deemed unreasonable as unfulfilled requests in their section 54.313 annual reports.”¹⁵ USAC is expected to verify that rate-of-return carriers have sufficient evidence to demonstrate that any unfulfilled requests were in fact unreasonable.¹⁶ To the extent USAC determines that insufficient evidence to support a denial of service, such finds shall be reported as “other matters.”¹⁷

¹² *Id.* ¶ 144.

¹³ *Connect America Fund*, WC Docket No. 10-90, *ETC Annual Reports and Certifications*, WC Docket No. 14-58, *Petition of USTelecom for Forbearance Pursuant to 47 U.S.C. § 160(c) from Obsolete ILEC, Regulatory Obligations that Inhibit Deployment of Next-Generation Networks*, WC Docket No. 14-192, Report and Order, FCC 14-190 (rel. Dec. 18, 2014) (*Report and Order*).

¹⁴ *Id.* ¶ 143.

¹⁵ *Id.* ¶ 153.

¹⁶ *Id.*

¹⁷ *Id.*